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Attorneys for Defendant LINWEI DING

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINWEI DING,

Defendant.

Case No. 3:24-CR-00141-VC

**DECLARATION OF GRANT P. FONDO IN  
SUPPORT OF DEFENDANT LINWEI DING'S  
OPPOSITION TO UNITED STATES' MOTION  
TO EXCLUDE EXPERT TESTIMONY OF  
MARK ESKRIDGE**

Date: September 23, 2025  
Time: 1:00 p.m.  
Courtroom: 4 (17th Floor)  
Judge: Hon. Vince Chhabria  
450 Golden Gate Avenue  
San Francisco, CA 94102

Filed/lodged concurrently herewith:

1. Opposition to United States' Motion to Exclude Expert Testimony of Mark Eskridge (Dkt. No. 149)

**DECLARATION OF GRANT P. FONDO**

I, Grant P. Fondo, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Linwei Ding (“Mr. Ding”) in the above-captioned action (the “Action”). I make this declaration in support of Mr. Ding’s Opposition to the government’s Motion to Exclude Expert Testimony of Mark Eskridge (Dkt. No. 149).

2. I have personal knowledge of the matters stated in this declaration and, if called upon to do so, I could and would competently testify to the matters set forth herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of an August 6, 2025 email from Casey Boome to Mr. Ding’s counsel.

4. Attached hereto as **Exhibit B** is a true and correct copy of the August 26, 2025 expert disclosure of defense expert Mark Eskridge

5. Attached hereto as **Exhibit C** is a true and correct copy of August 26, 2025 expert disclosure of government expert Andrew Crain.

6. Attached hereto as **Exhibit D** is a true and correct copy of an FBI FD-302 Report produced at Bates No. US-0076809.

7. Attached hereto as **Exhibit E** is a true and correct copy of FBI FD-302 Report produced at Bates No. US-0002005.

8. On August 29, 2025, the government produced its 17<sup>th</sup> document production, which contained over 16,000 documents. On September 9, 2025—the final day of fact discovery—the government produced its 19<sup>th</sup> document production, which contained over 80,000 documents. Due to the large size of the 19<sup>th</sup> production (over 20GB), it took the defense team and its eDiscovery vendor four days to process the files to a point where they could be reasonably reviewed. On September 15, 2025, the government confirmed that most of the files in the 17<sup>th</sup> and 19<sup>th</sup> productions were reproductions of prior productions or produced copies of materials extracted from Mr. Ding’s devices.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
2 September 16, 2025 in Boston, Massachusetts.

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4 /s/ Grant P. Fondo  
5 GRANT P. FONDO  
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